

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

JOHNNY W. WATKINS

PLAINTIFF

VS.

CAUSE NO.: 3:19-cv-232-DPJ-FKB

VIVINT, INC. and EQUIFAX  
INFORMATION SERVICES, LLC

DEFENDANTS

TO: Kaytie M. Pickett  
Jackie R. Bost, II  
JONES WALKER, LLP  
P.O. Box 427  
Jackson, MS 39205-0427

**NOTICE OF RULE 30(b)(6) DEPOSITION  
OF EQUIFAX INFORMATION SERVICES, LLC**

Please take notice that the Plaintiff will take the video and stenographic deposition of the designated representative(s) of Equifax Information Services, LLC (hereinafter "Equifax") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure on November 21, 2019 at 10:00 a.m. (EST) at the offices of King & Spalding, located at 1180 Peachtree Street NE, Atlanta, GA 30309 and continuing from day to day until completed.

The areas of inquires will include the following:

1. Equifax's procedures used to investigate disputes in accordance with 15 U.S.C. § 1681i, including the average number of disputes received;
2. The number of Equifax employees which investigate consumers' disputes, the average salary of these employees and the average number of hours said employees work a day;
3. Any and all communications between the Plaintiff and Equifax;
4. Any and all communications between Equifax and any third party regarding the

Plaintiff or the impermissible Vivint inquiry which appeared on the Plaintiff's Equifax credit reports at issue in this litigation;

5. Equifax's record keeping system, including the meaning of codes or abbreviations used in, and the identity of individuals identified in, the records produced by Equifax during this litigation;

6. The contents and meaning of any and all documents produced by Equifax in this matter;

7. Any and all training received by Equifax's employees regarding complying with the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.;

8. The contents of the Plaintiff's Equifax credit file;

9. The events alleged in the Plaintiff's Complaint;

10. The identity of Equifax employees with personal knowledge regarding the events alleged in the Plaintiff's Complaint;

11. The actions, if any, taken by Equifax or others to investigate Plaintiff's disputes to Equifax regarding the erroneous Vivint inquiry at issue in this litigation;

12. Communications between Equifax and any third party regarding the Plaintiff and/or the erroneous Vivint inquiry at issue in this litigation;

13. The average number of disputes of credit information received by Equifax;

14. The general set up of the department who is responsible for investigating consumer's disputes of information appearing on their Equifax credit report, including the equipment and tools available to employees within said department for use in investigating such disputes; and

15. General information regarding Equifax's business such as the type of business that Equifax engages in and the state(s) of the United States in which Equifax engages in such business.

The witness is requested to bring the following to the deposition:

1. Any and all documents requested in the Plaintiff's Requests for Production of Documents to Equifax but not yet produced to the Plaintiff before the day of the deposition;
2. All documents needed to accurately respond to the areas of inquiry listed above.

Respectfully submitted, this the 24<sup>th</sup> day of October, 2019.

/s/ Christopher E. Kittell

CHRISTOPHER E. KITTELL

Kittell Law Firm

P.O. Box 568

2464 Church Street, Suite A

Hernando, MS 38632

Phone: 662-298-3456

Fax: 855-896-8772

Email: ckittell@kittell-law.com

Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I, Christopher E. Kittell, hereby certify that I have on this the 24<sup>th</sup> day of October, 2019, electronically filed the foregoing with the Clerk of the Court using the ECF system, which caused a copy to be served upon all counsel of record.

/s/ Christopher E. Kittell

Christopher E. Kittell